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Attorneys for Defendants, COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI and JAKE ADAMS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JONATHAN WAYNE BOTTEN, SR.;  
TANJA DUDEK-BOTTEN;  
ANNABELLE BOTTEN; and J.B., a  
minor by and through his guardian  
JONATHAN WAYNE BOTTEN, SR..

## Plaintiffs.

VS.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; ISAIAH  
KEE; MICHAEL BLACWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 1-10 inclusive.

Defendants

CASE NO. 5:23-cv-00257-KK-SHK

*Assigned for All Purposes to:  
Hon. Kenly Kiya Kato—Courtroom #3*

**JOINT STIPULATION TO ALLOW  
COUNTY DEFENDANT DEPUTY  
ADAMS TO TESTIFY OUT OF  
ORDER**

Trial: July 28, 2025

*Complaint filed: 02/16/23  
FAC filed: 06/08/23*

## TO THE HONORABLE COURT:

Plaintiffs Jonathan Wayne Botten Sr., Tanja Dudek-Botten, Annabelle Botten, and J.B., a minor by and through his guardian *ad litem* Jonathan Wayne Botten Sr. (“Plaintiffs”) and Defendants Michael Blackwood, Isaiah Kee, and Bernardo Rubalcava (“State Defendants”), County of San Bernardino, Robert Vaccari, and Jake Adams (“County Defendants”) (collectively “Defendants”), hereby stipulate as

1 follows:

2 County Defendant, Deputy Jake Adams, may testify out of order if necessary,  
3 so that his testimony begins and is completed before August 1, 2025, at the trial set  
4 for July 28, 2025, as he will be unavailable from August 2-9, 2025.

5 Deputy Adams is a party and percipient witness to the incident and is  
6 anticipated to appear on the Parties' Joint Witness List. Deputy Adams has a  
7 scheduling conflict in that he will be out of country, on a pre-planned and pre-paid  
8 vacation from August 2-9, 2025. Therefore, the parties have met and conferred and  
9 have all agreed that Deputy Adams will be called, and will complete his testimony,  
10 before he becomes unavailable. The parties therefore stipulate to calling Deputy  
11 Adams for trial during the first week of trial, between July 28-August 1, 2025, and  
12 will, if necessary, call Deputy Adams out of order so that his testimony is completed  
13 on or before August 1, 2025.

14 The Parties hereby stipulate that County Defendant, Deputy Jake Adams, will  
15 be called to testify and complete his testimony between July 28, 2025 – August 1,  
16 2025, before he is unavailable as set forth herein.

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18 **IT IS SO STIPULATED.**

19 DATED: March 21, 2025

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By: /s/ Amy R. Margolies  
**SHANNON L. GUSTAFSON**  
**AMY R. MARGOLIES**  
Attorneys for Defendant,  
COUNTY OF SAN BERNARDINO  
ROBERT VACCARI, and JAKE ADAMS

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1 DATED: March 21, 2025

LAW OFFICES OF DALE K. GALIPO

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DATED: March 21, 2025

By /s/ Hang D. Le

**Dale K. Galipo**

**Hang D. Le**

Attorneys for Plaintiffs

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ROB BONTA

Attorney General of California

CHRISTINE E. GARSKE

Supervising Deputy Attorney General

/s/ Diana Esquivel

**DIANA ESQUIVEL**

Deputy Attorney General

*Attorneys for Defendants Blackwood, Kee, and Rubalcava*

\*The filer, Amy R. Margolies, hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur with the filing's content, and have authorized.

DATED: March 21, 2025

**LYNBERG & WATKINS**

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By: /s/ Amy R. Margolies

**SHANNON L. GUSTAFSON**

**AMY R. MARGOLIES**

**ANITA K. CLARKE**

Attorneys for Defendant,

COUNTY OF SAN BERNARDINO

ROBERT VACCARI, and JAKE ADAMS